

EXHIBIT A

FILED
Anita Escobedo
CLERK, SUPERIOR COURT
04/25/2022 11:24AM
BY: CCASTANEDA
DEPUTY

Case No.: S0400CV202200120
HON. BRYAN B. CHAMBERS

Byron F. Browne (030499)
BROWNE LAW GROUP
366 North Gilbert Rd, Suite 201
Gilbert, Arizona 85234
Phone/Fax: (480) 771-2442
byron@antilawyer.com
legal@antilawyer.com
Attorneys for Plaintiff

**IN THE SUPERIOR COURT FOR THE STATE OF
IN AND FOR THE COUNTY OF GILA**

CRYSTAL MARIE ENDERA, as next of kin of
Edward Else, deceased

Case No.:

Plaintiff,

COMPLAINT

vs.

(Tort/Motor Vehicle)

DARLENE WOODLIFF and JOHN DOE
WOODLIFF, wife and husband; **MIAMI**
POLICE DEPARTMENT; TOWN OF MIAMI,
an Arizona government entity; **JOHN DOES**
and/or **JANE DOES I-X, BLACK**
CORPORATIONS and/or WHITE LIMITED
PARTNERSHIPS I-X

(Tier 3)

Defendant.

Plaintiff, Crystal Marie Endera by and through counsel undersigned, for her
Complaint hereby alleges as follows:

JURISDICTION AND VENUE

1. This action is brought pursuant to 42 U.S.C §1983. Jurisdiction is based upon 28
U.S.C § 1331.

2. Venue in this district is proper because all facts pled and all acts and omissions



1 giving rise to the complaint occurred in Gila County, Arizona in the district of Arizona.

2 **PARTIES TO THIS ACTION**

3 3. Plaintiff, Crystal Endera (hereinafter "Crystal") is a citizen of the United States
4 and a resident of the state of Texas. Crystal is the sole biological child of the Decedent,
5 Edward Endera. When Edward was alive, he and Crystal would speak regularly, and were
6 close.
7

8 4. Edward was a citizen of the United States and a resident of the state of Arizona.
9 He was entitled to all protections afforded to citizens of the United States and Arizona law.
10

11 5. Edward spent the majority of his life residing in Arizona. At the time of his death
12 Edward was virtually homeless, had health issues, and struggled with substance abuse.

13 6. Defendant, Miami Police Department (hereinafter "Miami Police") is a political
14 subdivision of the State of Arizona. Defendant Miami Police is a law enforcement agency in
15 Gila County, Arizona. Defendant Miami Police is responsible for the training, hiring, control,
16 and supervision of all its officers and agents as well as the implementation and maintenance
17 of official and unofficial policies.
18

19 7. Defendant Miami Police employed Co-Defendant, Officer Darlene Woodliff.
20

21 8. Defendant, Officer Darlene Woodliff (hereinafter "Woodliff") was employed as
22 an officer with Defendant Miami Police when she struck and killed Edward. Defendant
23 Officer Woodliff is a United States citizen and, upon information and belief, a resident of
24 Gila County, Arizona. Defendant Officer Woodliff is being sued in her individual capacity.
25

26 9. Upon information and belief, Defendant Woodliff and John Doe Woodliff were





1 WIFE AND HUSBAND, and residents of Gila County, State of Arizona, were domiciled as
2 such the date of the incident and giving rise to this lawsuit. All actions alleged in this
3 Complaint were undertaken on behalf of and for the benefit of their marital community.

4 10. Defendant, Town of Miami is an Arizona government entity located and operating
5 within Gila County, Arizona.

6 11. Defendants designated herein as DOES I-X, BLACK CORPORATIONS I-X,
7 and WHITE LIMITED PARTNERSHIPS I-X, inclusive, are unknown to Plaintiff at this
8 present time; however, it is alleged and believed these Defendants were involved the
9 initiation, approval, support, or execution of the wrongful acts on which this action is
10 premised, or of similar actions directed against Plaintiff about which they are presently
11 unaware. As the specific identities of these parties are revealed through the course of
12 discovery, the DOES, BLACK, and WHITE will be replaced to identify these parties by their
13 true names and capacities.

14 12. At all times relevant herein all the actions of Defendant Officer Woodliff were
15 performed under the color of state law and pursuant to her authority as a police officer.

16 ALLEGATIONS COMMON TO ALL CLAIMS

17 **THE INCIDENT THAT TRIGGERED THE INSTANT LAWSUIT**

18 13. On September 23, 2021 Edward was walking southbound on Franz Avenue
19 towards Smith Street.

20 14. Edward walked with a cane, and was known to walk slow and hunched over.

21 15. A Witness was driving westbound on Smith Street. The Witness came to a



1 complete stop at the stop sign on Smith Street at Franz Avenue. The Witness observed
2 Edward hunched over, walking with his cane, on the left hand side of southbound Franz
3 Avenue. The Witness then turned northbound (right) on Franz Ave, and passed Edward as
4 Edward was walking southbound on Franz Ave. When the Witness arrived home,
5 approximately 60 seconds after he passed Edward, he heard loud screaming.
6

7 16. Defendant Officer Woodliff is a police officer employed by Miami Police.
8 Defendant Officer Woodliff swore an oath to support the Constitution of the United States,
9 the State of Arizona, and the laws of Defendant Miami Police jurisdiction.
10

11 17. Defendant Officer Woodliff was on duty as a police officer for Defendant Miami
12 Police on September 23, 2021.

13 18. On September 23, 2021 Defendant Officer Woodliff was on-patrol driving
14 westbound on Smith Street. Defendant Officer Woodliff approached the intersection of
15 Smith Street and Franz Avenue. This intersection is controlled by a stop sign. Defendant
16 Officer Woodliff did not stop for the stop sign on Smith Street at the intersection of Franz
17 Avenue. Defendant Officer Woodliff turned northbound (right) on Franz Avenue and struck
18 Edward.
19

20 19. Defendant Officer Woodliff was familiar with Edward. Defendant Officer
21 Woodliff knew where Edward lived, which was approximately 100 yards or less from where
22 Defendant Officer Woodliff struck Edward.
23

24 20. After striking Edward Defendant Officer Woodliff kept driving until she heard
25
26

1 screaming, which is when she stopped. Defendant Officer Woodliff opened the driver door
2 on her police patrol vehicle, and observed Edward underneath her police patrol vehicle.

3 21. Defendant Officer Woodliff called 911, and/or called emergency services on
4 multiple occasions. Defendant Officer Woodliff's delay in calling 911, and/or emergency
5 services caused unnecessary delay in 911 and/or emergency services arriving to provide
6 medical assistance and other life saving assistance; which prolonged Edward's pain and
7 suffering and the expeditious nature in which Edward received medical assistance and other
8 life saving assistance.
9

10 22. Defendant Officer Woodliff called 911, and/or called emergency services on
11 multiple occasions. Defendant Officer Woodliff's failure to properly inform 911 and/or
12 emergency services of the exact location of the alleged incident prolonged Edward's pain
13 and suffering and the expeditious nature in which Edward received medical assistance and
14 other life saving assistance.
15

16 23. Under information and belief, Defendant Officer Woodliff routinely patrolled the
17 streets of Franz Ave and Smith Street. Under information and belief, she patrolled and/or
18 drove the streets of Franz Ave and Smith Street hundreds if not thousands of times.
19

20 24. Defendant Officer Woodliff has training, education and experience as a police
21 officer.
22

23 25. Defendant Officer Woodliff is educated and experienced in documenting and
24 obtaining key facts and evidence in criminal investigations, motor vehicle accidents, and the
25 like.
26



1 26. Gila River Sheriff's Office conducted the investigation into this incident.

2 27. Defendant Officer Woodliff reported to Gila River Sheriff's Office that she was
3 traveling 20 miles per hour when her vehicle struck Edward.

4 28. Upon information and belief, Defendant Officer Woodliff never informed anyone
5 from Gila River Sheriff's Office that she stopped at the stop sign on Smith Street before
6 turning northbound (right) on Franz Ave.

7 29. Edward was transported for treatment for his injuries. Edward never fully
8 recovered from his injuries. Edward had health issues that may have contributed to his death.
9 However, absent Defendant Officer Woodliff hitting and driving over Edward he would be
10 alive today.

11 **FIRST CLAIM FOR RELIEF**

12 *(Violation of Civil and Constitutional rights of Familial Association Under 42 U.S.C. §1983)*

13 **Against Defendant Officer Woodliff**

14 30. Plaintiff repeats and re-alleges the allegations of paragraphs 1 – 29 as if fully set
15 forth herein.

16 31. As the daughter of Edward, Plaintiff possessed a Fourteenth Amendment
17 substantive due process right to the familial association with Edward based on her right and
18 interest in liberty, of which she was deprived.

19 32. Defendant Officer Woodliff acting under the color of state law, and without due
20 process of law, violated Plaintiff's rights by the use of unreasonable, unjustified, excessive
21 force and violence, and caused injuries which resulted in Edwards death, all without any
22



1 provocation or threat. Defendant Officer Woodliff violated and deprived Plaintiff of her
2 liberty interest arising out of her relationship with Edward.

3 **SECOND CLAIM FOR RELIEF**

4 *(Violation of Civil and Constitutional Rights of Familial Association Under 42 U.S.C.*
5 *§1983)*

6
7 **Against Defendant Miami Police under a legal theory of municipal liability**

8 33. Plaintiff repeats and re alleges the allegations of paragraph 1 through 32 as if fully
9 set forth herein.

10 34. At all times relevant here in, Defendant Officer Woodliff was acting under the
11 color of state law.

12 35. As the daughter of Edward, Plaintiff possesses a Fourteenth Amendment
13 substantive due process right to familial association with Edward based upon her right and
14 interest in liberty, of which she was deprived.

15 36. Defendant Miami Police hired, trained, and supervised Defendant Officer
16 Woodliff.

17 37. Defendant Miami Police is liable to the Plaintiff under this cause of action for,
18 among other things as alleged in this Complaint, its failure to properly train Officer Woodliff.
19 The training program is (1) inadequate; (2) the training policies, and lack thereof, amount to
20 deliberate indifference to the rights of the people with whom the police come into contact,
21 including Edward; and (3) the deliberate indifference caused the constitutional violation at
22 issue in this case.
23
24
25
26



1 38. These policies by Defendant Miami Police and failure to train its officers deprived
2 Plaintiff of rights secured to her by the Fourteenth Amendment to the United States
3 Constitution.

4 39. Pursuant to 42 U.S.C. §1983 and §1988 Plaintiff is entitled to reasonable
5 attorney's fees and costs against Defendant Miami Police.
6

7 **THIRD CLAIM FOR RELIEF**

8 *(Negligence)*

9 **Against Town of Miami**

10 40. Plaintiff repeats and realleges the allegations of paragraphs 1 - 39 as a fully set
11 forth herein.
12

13 41. Upon information and belief, Plaintiff believes that Defendants may allege that
14 this accident was wholly or partially caused due to a street light not functioning, not being
15 "on".
16

17 42. Defendant Town of Miami had a duty of care to ensure that the street lights in
18 the City of Miami were functional and fully operational.

19 43. Defendant Town of Miami knew or should have known that if the street lights
20 were not functional and fully operational that an accident such as the subject accident could
21 result.
22

23 44. Defendant Town of Miami breached the duty of care to Plaintiff causing injuries
24 and death.
25
26



1 45. As a result of the collision caused by Defendant's negligence, Plaintiff suffered
2 pain and suffering, inconvenience, curtailment of usual activities, loss of enjoyment of life,
3 great pain of body and mind, inconvenience, loss of enjoyment, and pain and suffering in the
4 future.

5
6 46. As a result of the collision caused by Defendant's negligence, Plaintiff incurred
7 expenses for medical treatment and expenses for related treatment and care as a result of
8 injuries sustained in this collision, and he will continue to incur such expenses.

9 47. Defendants actions were the legal, direct and proximate cause of Edward's death.

10
11
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1 **WHEREFORE**, Plaintiff prays for a judgment in favor of Plaintiff and against
2 Defendants as follows:

- 3 1. For compensatory damages, including wrongful death damages under federal and
4 state law, in the amount to be proven at trial;
5 2. For pre- and post-judgment interest at the maximum legal rate;
6 3. As to the first and second cause of action for costs and attorney's fees incurred in
7 prosecuting this action in accordance with 42 U.S.C. §1988;
8 4. For costs of suit as to all causes of action; and
9 5. For such further relief as the Court may deem just, proper, and appropriate.
10

11 **RESPECTFULLY SUBMITTED** this 22nd day of April, 2022
12
13
14

BROWNE LAW GROUP

15
16 By: /s/ Byron Browne, Esq.
17 Byron F. Browne (030499)
18 366 North Gilbert Rd, Suite 201
19 Gilbert, Arizona 85234
20 Attorneys for Plaintiff
21
22
23
24
25
26



EXHIBIT B



**IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA**

CRYSTAL MARIE ENDERA
Plaintiff,

vs.

DARLENE WOODLIFF, et al.
Defendant,

Case No.: S0400CV202200120

PROOF OF SERVICE

Came to hand on 4/28/2022 at 3:25 PM a true copy of the below referenced documents.

The undersigned is over the age of 18 years and not a party to the action. The undersigned is qualified and appointed under ARCP §4(d) & §4(e) to serve legal process within the State of Arizona.

SERVED On 05/04/2022 at 10:39 AM, the undersigned served copies of:
**SUMMONS; COMPLAINT; CERTIFICATE OF COMPULSORY ARBITRATION; PLAINTIFF'S OFFER OF JUDGMENT TO
DEFENDANT DARLENE WOODLIFF**

Upon: **DARLENE WOODLIFF**
At: **8867 E CIVANO DR, GOLD CANYON, AZ 85118**

In the following manner:

PERSONAL SERVICE ON AN INDIVIDUAL per ARCP Rule 4.1(d)

Description:

Gender: **Female** Race/Skin: **Hispanic** Age: **66** Weight: **170** Height: **5'6"** Hair: **Black** Glasses: **No** Other:

I declare under penalty of perjury under the laws of the State of Arizona that the foregoing information contained in the Proof of Service is true and correct. [ARCP Rule 80(c)]

Client File #:



Number: 34082

SIGNED, _____

TOM RANKIN,

Private Process Server ID # **PN201300007**,
PINAL County

EXHIBIT C



FILED
Anita Escobedo
CLERK, SUPERIOR COURT
05/06/2022 2:59PM
BY: CCASTANEDA
DEPUTY

IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA

CRYSTAL MARIE ENDERA
Plaintiff,

vs.

DARLENE WOODLIFF, et al.
Defendant,

Case No.: S0400CV202200120

PROOF OF SERVICE

Came to hand on 4/28/2022 at 3:15 PM a true copy of the below referenced documents.

The undersigned is over the age of 18 years and not a party to the action. The undersigned is qualified and appointed under ARCP §4(d) & §4(e) to serve legal process within the State of Arizona.

SERVED On 05/06/2022 at 9:05 AM, the undersigned served copies of:
SUMMONS; COMPLAINT; CERTIFICATE OF COMPULSORY ARBITRATION; PLAINTIFF'S OFFER OF JUDGMENT
TO DEFENDANT DARLENE WOODLIFF

Upon: TOWN OF MIAMI
C/O TOWN MAYOR, SAMMY GONZALES
At: 500 SULLIVAN ST, MIAMI, AZ 85539

In the following manner:

CORPORATE, BUSINESS OR GOVERNMENT SERVICE by leaving a copy of the legal process with:
SAMMY GONZALES Title: MAYOR, a person authorized by appointment or by law to accept service and informing that person of the contents thereof.

Description:

Gender: Male Race/Skin: Hispanic Age: 52 Weight: 180 Height: 6' Hair: Gray Glasses: No Other:

I declare under penalty of perjury under the laws of the State of Arizona that the foregoing information contained in the Proof of Service is true and correct. [ARCP Rule 80(c)]

SIGNED, _____

TOM RANKIN,

Client File #:



Number: 34079

Private Process Server ID # PN201300007,
PINAL County



IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA

CRYSTAL MARIE ENDERA
Plaintiff,

vs.

DARLENE WOODLIFF, et al.
Defendant,

Case No.: S0400CV202200120

PROOF OF SERVICE

Came to hand on 4/28/2022 at 3:16 PM a true copy of the below referenced documents.

The undersigned is over the age of 18 years and not a party to the action. The undersigned is qualified and appointed under ARCP §4(d) & §4(e) to serve legal process within the State of Arizona.

SERVED On 05/04/2022 at 9:07 AM, the undersigned served copies of:
SUMMONS; COMPLAINT; CERTIFICATE OF COMPULSORY ARBITRATION; PLAINTIFF'S OFFER OF JUDGMENT TO DEFENDANT DARLENE WOODLIFF

Upon: **TOWN OF MIAMI**
C/O TOWN MANAGER, MICHA GAUDET
At: **500 SULLIVAN ST, MIAMI, AZ 85539**

In the following manner:

CORPORATE, BUSINESS OR GOVERNMENT SERVICE by leaving a copy of the legal process with:
MICHA GAUDET Title: MIAMI TOWN MANAGER, a person authorized by appointment or by law to accept service and informing that person of the contents thereof.

Description:

Gender: Male Race/Skin: Caucasian Age: 31 Weight: 160 Height: 5'6" Hair: Black Glasses: No Other:

I declare under penalty of perjury under the laws of the State of Arizona that the foregoing information contained in the Proof of Service is true and correct. [ARCP Rule 80(c)]

Client File #:



Number: 34080

SIGNED, _____

TOM RANKIN,

Private Process Server ID # PN201300007,
PINAL County



IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA

CRYSTAL MARIE ENDERA
Plaintiff,

vs.

DARLENE WOODLIFF, et al.
Defendant,

Case No.: S0400CV202200120

PROOF OF SERVICE

Came to hand on 4/28/2022 at 3:18 PM a true copy of the below referenced documents.

The undersigned is over the age of 18 years and not a party to the action. The undersigned is qualified and appointed under ARCP §4(d) & §4(e) to serve legal process within the State of Arizona.

SERVED On 05/06/2022 at 9:05 AM, the undersigned served copies of:
SUMMONS; COMPLAINT; CERTIFICATE OF COMPULSORY ARBITRATION; PLAINTIFF'S OFFER OF JUDGMENT TO DEFENDANT DARLENE WOODLIFF

Upon: **TOWN OF MIAMI**
C/O TOWN CLERK, KAREN NORRIS
At: **500 SULLIVAN ST, MIAMI, AZ 85539**

In the following manner:

CORPORATE, BUSINESS OR GOVERNMENT SERVICE by leaving a copy of the legal process with:
KAREN NORRIS Title: **TOWN CLERK**, a person authorized by appointment or by law to accept service and informing that person of the contents thereof.

Description:

Gender: Female Race/Skin: Caucasian Age: 52 Weight: 130 Height: 5'4" Hair: Blonde Glasses: n Other:

I declare under penalty of perjury under the laws of the State of Arizona that the foregoing information contained in the Proof of Service is true and correct. [ARCP Rule 80(e)]

Client File #:



Number: 34081

SIGNED, _____

TOM RANKIN,

Private Process Server ID # PN201300007,
PINAL County



**IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA**

CRYSTAL MARIE ENDERA
Plaintiff,

vs.

DARLENE WOODLIFF, et al.
Defendant,

Case No.: S0400CV202200120

PROOF OF SERVICE

Came to hand on 5/2/2022 at 1:41 PM a true copy of the below referenced documents.

The undersigned is over the age of 18 years and not a party to the action. The undersigned is qualified and appointed under ARCP §4(d) & §4(e) to serve legal process within the State of Arizona.

SERVED On 5/6/2022 at 10:17 AM, the undersigned served copies of:

**SUMMONS; COMPLAINT; CERTIFICATE OF COMPULSORY ARBITRATION; PLAINTIFF'S OFFER OF JUDGMENT
TO DEFENDANT DARLENE WOODLIFF**

Upon: **MIAMI POLICE DEPARTMENT**
C/O CHIEF KEITH THOMPSON
At: **2635 E. BROADWAY RD, MESA, AZ 85204**

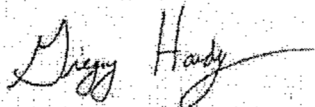
In the following manner:

CORPORATE, BUSINESS OR GOVERNMENT SERVICE by leaving a copy of the legal process with:
CHIEF KEITH THOMPSON Title: **CHIEF OF POLICE**, a person authorized by appointment or by law to accept service and
informing that person of the contents thereof.

Description:

Gender: Male Race/Skin: Caucasian Age: 50 - 55 Yrs Weight: 161-200 Lbs. Height: 5'7" - 5'9" Hair: Salt &
Pepper Glasses: Yes Other:

I declare under penalty of perjury under the laws of the State of Arizona that the foregoing information contained in the Proof of Service is true and correct. [ARCP Rule 80(c)]

SIGNED, 
GREGORY S. HARDY,

Client File #:



Job Number: 34127

Private Process Server ID # MC9021,
MARICOPA County

EXHIBIT D



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Case Filed Documents

Filing Details

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Case # S0400CV202200120**Filing Type** General Civil**Location** Gila - Superior Court**Court Case Title** CRYSTAL MARIE ENDERA PLAINTIFF vs DARLENE WOODLIFF et al. DEFENDANT

Note: The documents filed in your case are listed below. These documents are not in the exact order of filing, but those documents that were most recently filed are at the top of the page.

Case Filed Documents**Document Name****Filing Date**EFILING: Defendants' Answer to Plaintiff's Complaint

05/25/2022 1:45:49 PM MST

EFILING: Demand for Jury Trial

05/25/2022 1:45:49 PM MST

EFILING: Notice of Serving Offer of Judgement to Defendant Town of Miami

05/11/2022 1:21:35 PM MST

EFILING: Notice of Serving Offer of Judgement to Defendant Miami Police Dept

05/11/2022 1:15:37 PM MST

EFILING: Notice of Serving Offer of Judgement to Defendant Darlene Woodliff

05/11/2022 12:51:22 PM MST

EFILING: Proof of Service

05/06/2022 2:59:20 PM MST

EFILING: Complaint

04/25/2022 11:24:28 AM MST

EFILING: Certificate Of Compulsory Arbitration - Is Not Subject To

04/25/2022 11:24:28 AM MST

EFILING: Summons

04/25/2022 11:24:28 AM MST

EFILING: Summons

04/25/2022 11:24:28 AM MST

EFILING: Summons

04/25/2022 11:24:28 AM MST

EFILING: Discovery Tier Level 3

04/25/2022 11:24:28 AM MST

Person/Attorney Filing: Byron F Browne
Mailing Address: 366 North Gilbert Road Suite 202
City, State, Zip Code: Gilbert, AZ 85234
Phone Number: (480)771-2442
☐ Representing Self, Without an Attorney
(If Attorney) State Bar Number: 030499, Issuing State: AZ
Attorney E-Mail Address: legal@antilawyer.com

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA

Discovery Tier Level 3

Person/Attorney Filing: Byron F Browne
Mailing Address: 366 North Gilbert Road Suite 202
City, State, Zip Code: Gilbert, AZ 85234
Phone Number: (480)771-2442
E-Mail Address: legal@antilawyer.com
[] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 030499, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA

Crystal Marie Endera
Plaintiff(s),
v.
Darlene Woodliff, et al.
Defendant(s).

Case No. S0400CV202200120

SUMMONS

To: Town of Miami

WARNING: THIS AN OFFICIAL DOCUMENT FROM THE COURT THAT AFFECTS YOUR RIGHTS. READ THIS SUMMONS CAREFULLY. IF YOU DO NOT UNDERSTAND IT, CONTACT AN ATTORNEY FOR LEGAL ADVICE.

1. A lawsuit has been filed against you. A copy of the lawsuit and other court papers were served on you with this Summons.
2. If you do not want a judgment taken against you without your input, you must file an Answer in writing with the Court, and you must pay the required filing fee. To file your Answer, take or send the papers to Clerk of the Superior Court, 1400 E Ash Street, Globe, Arizona 85501 or electronically file your Answer through one of Arizona's approved electronic filing systems at <http://www.azcourts.gov/efilinginformation>.
Mail a copy of the Answer to the other party, the Plaintiff, at the address listed on the top of this Summons.
Note: If you do not file electronically you will not have electronic access to the documents in this case.
3. If this Summons and the other court papers were served on you within the State of Arizona, your Answer must be filed within **TWENTY (20) CALENDAR DAYS** from the date of service, not counting the day of service. If this Summons and the other court papers were served on you outside the State of Arizona, your Answer must be filed within **THIRTY (30) CALENDAR DAYS** from the date of service, not counting the day of service.

Requests for reasonable accommodation for persons with disabilities must be made to the court by parties at least 3 working days in advance of a scheduled court proceeding.

GIVEN under my hand and the Seal of the Superior Court of the State of Arizona in and for the County of GILA

SIGNED AND SEALED this date: *April 25, 2022*

Anita Escobedo
Clerk of Superior Court

By: *CCASTANEDA*
Deputy Clerk



Person/Attorney Filing: Byron F Browne
Mailing Address: 366 North Gilbert Road Suite 202
City, State, Zip Code: Gilbert, AZ 85234
Phone Number: (480)771-2442
E-Mail Address: legal@antilawyer.com
[] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 030499, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA

Crystal Marie Endera
Plaintiff(s),
v.
Darlene Woodliff, et al.
Defendant(s).

Case No. S0400CV202200120

SUMMONS

To: Miami Police Department

WARNING: THIS AN OFFICIAL DOCUMENT FROM THE COURT THAT AFFECTS YOUR RIGHTS. READ THIS SUMMONS CAREFULLY. IF YOU DO NOT UNDERSTAND IT, CONTACT AN ATTORNEY FOR LEGAL ADVICE.

1. A lawsuit has been filed against you. A copy of the lawsuit and other court papers were served on you with this Summons.
2. If you do not want a judgment taken against you without your input, you must file an Answer in writing with the Court, and you must pay the required filing fee. To file your Answer, take or send the papers to Clerk of the Superior Court, 1400 E Ash Street, Globe, Arizona 85501 or electronically file your Answer through one of Arizona's approved electronic filing systems at <http://www.azcourts.gov/efilinginformation>.
Mail a copy of the Answer to the other party, the Plaintiff, at the address listed on the top of this Summons.
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Requests for reasonable accommodation for persons with disabilities must be made to the court by parties at least 3 working days in advance of a scheduled court proceeding.

GIVEN under my hand and the Seal of the Superior Court of the State of Arizona in and for the County of GILA

SIGNED AND SEALED this date: *April 25, 2022*

Anita Escobedo
Clerk of Superior Court

By: *CCASTANEDA*
Deputy Clerk



Person/Attorney Filing: Byron F Browne
Mailing Address: 366 North Gilbert Road Suite 202
City, State, Zip Code: Gilbert, AZ 85234
Phone Number: (480)771-2442
E-Mail Address: legal@antilawyer.com
[] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 030499, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA

Crystal Marie Endera
Plaintiff(s),
v.
Darlene Woodliff, et al.
Defendant(s).

Case No. S0400CV202200120

SUMMONS

To: Darlene Woodliff

WARNING: THIS AN OFFICIAL DOCUMENT FROM THE COURT THAT AFFECTS YOUR RIGHTS. READ THIS SUMMONS CAREFULLY. IF YOU DO NOT UNDERSTAND IT, CONTACT AN ATTORNEY FOR LEGAL ADVICE.

1. A lawsuit has been filed against you. A copy of the lawsuit and other court papers were served on you with this Summons.
2. If you do not want a judgment taken against you without your input, you must file an Answer in writing with the Court, and you must pay the required filing fee. To file your Answer, take or send the papers to Clerk of the Superior Court, 1400 E Ash Street, Globe, Arizona 85501 or electronically file your Answer through one of Arizona's approved electronic filing systems at <http://www.azcourts.gov/efilinginformation>.
Mail a copy of the Answer to the other party, the Plaintiff, at the address listed on the top of this Summons.
Note: If you do not file electronically you will not have electronic access to the documents in this case.
3. If this Summons and the other court papers were served on you within the State of Arizona, your Answer must be filed within TWENTY (20) CALENDAR DAYS from the date of service, not counting the day of service. If this Summons and the other court papers were served on you outside the State of Arizona, your Answer must be filed within THIRTY (30) CALENDAR DAYS from the date of service, not counting the day of service.

Requests for reasonable accommodation for persons with disabilities must be made to the court by parties at least 3 working days in advance of a scheduled court proceeding.

GIVEN under my hand and the Seal of the Superior Court of the State of Arizona in and for the County of GILA

SIGNED AND SEALED this date: *April 25, 2022*

Anita Escobedo
Clerk of Superior Court

By: *CCASTANEDA*
Deputy Clerk



FILED
Anita Escobedo
CLERK, SUPERIOR COURT
04/25/2022 11:24AM
BY: CCASTANEDA
DEPUTY

Case No.: S0400CV202200120
HON. BRYAN B. CHAMBERS

Person/Attorney Filing: Byron F Browne
Mailing Address: 366 North Gilbert Road Suite 202
City, State, Zip Code: Gilbert, AZ 85234
Phone Number: (480)771-2442
E-Mail Address: legal@antilawyer.com
☐ Representing Self, Without an Attorney
(If Attorney) State Bar Number: 030499, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GILA

Crystal Marie Endera
Plaintiff(s),
v.
Darlene Woodliff, et al.
Defendant(s).

Case No.

**CERTIFICATE OF
COMPULSORY ARBITRATION**

I certify that I am aware of the dollar limits and any other limitations set forth by the Local Rules of Practice for the Gila County Superior Court, and I further certify that this case IS NOT subject to compulsory arbitration, as provided by Rules 72 through 77 of the Arizona Rules of Civil Procedure.

RESPECTFULLY SUBMITTED this

By: Byron F Browne /s/
Plaintiff/Attorney for Plaintiff

FILED
Anita Escobedo
CLERK, SUPERIOR COURT
04/25/2022 11:24AM
BY: CCASTANEDA
DEPUTY

Case No.: S0400CV202200120
HON. BRYAN B. CHAMBERS

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legal@antilawyer.com
Attorneys for Plaintiff

IN THE SUPERIOR COURT FOR THE STATE OF
IN AND FOR THE COUNTY OF GILA

CRYSTAL MARIE ENDERA, as next of kin of
Edward Else, deceased

Plaintiff,

vs.

DARLENE WOODLIFF and JOHN DOE
WOODLIFF, wife and husband; MIAMI
POLICE DEPARTMENT; TOWN OF MIAMI,
an Arizona government entity; JOHN DOES
and/or JANE DOES I-X, BLACK
CORPORATIONS and/or WHITE LIMITED
PARTNERSHIPS I-X

Defendant.

Case No.:

COMPLAINT

(Tort/Motor Vehicle)

(Tier 3)

Plaintiff, Crystal Marie Endera by and through counsel undersigned, for her
Complaint hereby alleges as follows:

JURISDICTION AND VENUE

1. This action is brought pursuant to 42 U.S.C §1983. Jurisdiction is based upon 28
U.S.C § 1331.

2. Venue in this district is proper because all facts pled and all acts and omissions

